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6 UNITED STATES DISTRICT COURT
 7 WESTERN DISTRICT OF WASHINGTON
 8 AT SEATTLE

9 ANKER INNOVATIONS TECHNOLOGY
 10 CO., LTD.,

11 Plaintiff,

12 v.

13 AMERICA UGREEN LIMITED, UGREEN
 14 IMPORT & EXPORT CO., LTD., AND
 UGREEN GROUP LIMITED,

15 Defendant.

Case No. 2:25-cv-00379-JNW

STIPULATION AND ~~PROPOSED~~
 ORDER TO EXTEND TIME RE
 MOTION TO DISMISS

16 Plaintiff Anker Innovations Technology Co., Ltd. (“Plaintiff” or “Anker”) hereby files
 17 this Stipulation to extend the date for Plaintiff to respond to the Motion to Dismiss (“Mot.”)
 18 filed by Defendants America Ugreen Limited, Ugreen Import & Export Co., Ltd., and Ugreen
 19 Group Limited (collectively, “Defendants” or “Ugreen”), and for Defendants to file a reply,
 20 pursuant to Federal Rule of Civil Procedure 6(b), as follows:

- 21 1. Plaintiff filed this design patent infringement action against Ugreen on
 22 February 28, 2025.
 23 2. America Ugreen Limited was served with the Complaint on March 7, 2025.
 24 3. America Ugreen Limited’s response to the Complaint is currently due to this
 25 Court on March 28, 2025.

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 28 STIPULATION AND ~~PROPOSED~~ ORDER
 TO EXTEND TIME RE MTD

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1 4. The parties agreed to and the Court granted an extension of time for Defendants
2 to respond to the complaint to align the deadline for the domestic and foreign defendants and
3 set the deadline for both as June 26, 2025.

4 5. Defendants filed a motion to dismiss on June 26, 2025, making Plaintiff's
5 opposition due on July 17, and Defendants' reply on July 24.

6 6. The parties now agree to extend Plaintiff's opposition deadline by two weeks to
7 July 31, 2025, and Defendants' reply deadline by one week to August 14, 2025, to
8 accommodate preexisting travel plans by counsel.

9 7. **THEREFORE**, the parties stipulate that Plaintiff shall have until July 31, 2025
10 Defendants shall have until June 26, 2025 to respond to Defendants' motion to dismiss and
11 that Defendants shall have until August 14, 2025 to file a reply in support of their motion to
12 dismiss, and hereby requests that the Court issue an order to that effect.

1 Dated: July 11, 2025

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43 Attorney for Defendants America
44 Ugreen Limited, Ugreen Import &
45 Expert Co. Ltd., and Ugreen Group
46 Limited

47 *Pursuant to this Court's Electronic Filing
48 Procedure III L, the electronic signatory has
49 obtained approval from all other signatories.

1 **[PROPOSED] ORDER**
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3 The Court having considered the parties' Stipulation to Extend Time to Respond
4 Regarding Defendants' Motion to Dismiss, and finding good cause, hereby ORDERS that
5 Plaintiff Anker Innovations Technology Co., Ltd. Shall have until July 31, 2025 to file an
6 opposition to the motion to dismiss filed by Defendants America Ugreen Limited, Ugreen
7 Import & Export Co., Ltd., and Ugreen Group Limited ("Defendants") and that Defendants
8 shall have until August 14, 2025 to file a reply in support of their motion to dismiss.

9
10 **IT IS SO ORDERED.**

11 Dated: July 14, 2025



12 *Honorable Jamal N. Whitehead*
13 United States District Judge